

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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TERRELL WENDRICKS,

Plaintiff,

vs.

Case No.: 20-CV-1189

ANNA SERRES, RODNEY REETZ,  
ALEXANDER CARLSON,  
LUCY ELFMANN, and  
AARON WALKER,

Defendants.

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**DECLARATION OF JASMYNE M. BAYNARD**

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STATE OF WISCONSIN     )  
                                      ) ss  
MILWAUKEE COUNTY     )

Jasmyne M. Baynard, being first duly sworn under oath, declares and states as follows:

1. My name is Jasmyne M. Baynard. I am an attorney licensed to practice law in the State of Wisconsin and am an attorney with Wirth + Baynard, which represents Defendants Anna Serres, Rodney Reetz, Alexander Carlson, Lucy Elfman and Aaron Walker in this lawsuit. I make this Declaration based upon my personal knowledge and in support of Defendants' Opposition to Plaintiff's Motion for Legal Fees and Costs Pursuant to 42 U.S.C. § 1988.

2. During closing statements, Plaintiff's Counsel informed the jury that each named Defendant was a "training officer" and asked the jury to award punitive damages to send a message.

3. Prior to trial Plaintiff demanded \$75,000.00 to settle Plaintiff's claims.

4. Per the Wisconsin State Bar Lawyer Directory Attorney Andrea N. Panozzo graduated from law school in May 2023.

5. Attached as **Baynard Declaration Exhibit A** is a true and accurate copy of Attorney Andrea N. Panozzo's bio with Kravit, Hovel & Krawczyk.

6. Per the Wisconsin State Bar Lawyer Directory Attorney Wesley E. Haslam graduated from law school in May 2023.

7. Attached as **Baynard Declaration Exhibit B** is a true and accurate copy of Attorney Wesley E. Haslam's bio with Kravit, Hovel & Krawczyk.

8. Attached as **Baynard Declaration Exhibit C** is a true and accurate copy of Attorney Brian T. Fahl's bio with Kravit, Hovel & Krawczyk.

9. Attached as **Baynard Declaration Exhibit D** is a true and accurate copy of Kravit, Hovel & Krawczyk's Practice Areas as outlined on their web page.

10. Attached as **Baynard Declaration Exhibit E** is a true and accurate copy of a July 31, 2024, email from Plaintiff's counsel to Defendants regarding Ms. Houston availability to testify live at trial.

11. Attached as **Baynard Declaration Exhibit F** is a duplicate table to Plaintiff's itemized hours, which has been put in chronological order and color coded according to the work performed, *i.e.*, depositions, motions, trial, etc.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 20<sup>th</sup> day of September 2024.

/s/ Jasmyne M. Baynard  
Jasmyne M. Baynard